

U.S. Department of Justice

United States Attorney Eastern District of New York

AAS:ICR F. #2015R00096

271 Cadman Plaza East Brooklyn, New York 11201

June 8, 2016

By ECF and Hand

Deborah A. Colson, Esq. Colson & Harris LLP 80 Broad Street, 19th Floor New York, New York 10004

Anthony L. Ricco, Esq. 20 Vesey Street, Suite 400 New York, New York 10007

Re: United States v. Munther Omar Saleh, et al.

Criminal Docket No. 15-393 (MKB)

Dear Ms. Colson and Mr. Ricco:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being produced pursuant to the Protective Orders entered by the Court on August 20, 2015, as modified on December 16, 2015.

| Bates Range | Information Contained |
|--------------------|--|
| SMR001263 | A forensic image of Alaah Saadeh's Samsung Galaxy Cellular |
| | Telephone |
| SMR001264- | Redacted surveillance notes, reports, and photographs |
| SMR002605 | |
| SMR002606- | Redacted reports reflecting electronic communications between |
| SMR002613 | Munther Saleh and a Confidential Human Source on or about May 7, |
| | 2015 |

This disclosure supplements the government's prior productions. The government renews its request for reciprocal discovery from the defendants.

Please feel free to contact me if you have additional questions.

Very truly yours,

ROBERT L. CAPERS United States Attorney

By: /s/ Ian C. Richardson
Ian C. Richardson
Assistant U.S. Attorney
(718) 254-6299

Enclosures

cc: Clerk of the Court (MKB) (by ECF) (without enclosures)